

BECKER & POLIAKOFF LLP

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*Attorneys for Defendants Janet Jaffe Trust UA dtd
4/20/90 and the Alvin Jaffe Trust dtd 4/20/90; and Janet
Jaffe, individually and in her capacity as Trustee for the
Janet Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe
Trust dtd 4/20/90*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JANET JAFFE TRUST UA DTD 4/20/90; ALVIN
JAFFE TRUST DTD 4/20/90; and JANET JAFFE,
individually and in her capacity as Trustee for the Janet
Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe Trust
dtd 4/20/90,

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04798 (SMB)

Defendants.

NOTICE OF SUBSTITUTION OF COUNSEL AND PROPOSED ORDER

PLEASE TAKE NOTICE that the undersigned hereby consent to the substitution of Becker & Poliakoff, LLP for Lax & Neville LLP as counsel for the Janet Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe Trust dtd 4/20/90; and Janet Jaffe, individually and in her capacity as Trustee for the Janet Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe Trust dtd 4/20/90 (the “Defendants”). All notices given or required to be given in this adversary proceeding shall be given to and served upon the following:

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PLEASE TAKE FURTHER NOTICE that the Defendants have knowledge of and consent to this substitution of counsel.

September 10, 2015

September 10, 2015

LAX & NEVILLE LLP

BECKER & POLIAKOFF LLP

Withdrawing Attorneys for Defendants

Superseding Attorneys for Defendants

By: /s/ Brian Neville

By: /s/ Helen Davis Chaitman

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New York, New York 10018
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Helen Davis Chaitman
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SO ORDERED:

/s/
HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

Dated: September __, 2015
New York, New York

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

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SECURITIES LLC,

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JANET JAFFE TRUST UA DTD 4/20/90; ALVIN
JAFFE TRUST DTD 4/20/90; and JANET JAFFE,
individually and in her capacity as Trustee for the Janet
Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe Trust
dtd 4/20/90,

Defendants.

Adv. Pro. No. 10-04798 (SMB)

I, HELEN DAVIS CHAITMAN, declare as follows:

1. I am a member of the firm Becker & Poliakoff, LLP and a member of the Bar of this Court Pursuant to Local Civil Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York. I submit this declaration in support of the accompanying notice and proposed order substituting Becker & Poliakoff, LLP for Lax &

Neville LLP as counsel for the Janet Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe Trust dtd 4/20/90; and Janet Jaffe, individually and in her capacity as Trustee for the Janet Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe Trust dtd 4/20/90 (the “Defendants”) in the above-captioned adversary proceeding. I also have read Local Bankruptcy Rule 2090-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York.

2. The Defendants have requested and consent to this substitution of counsel.

3. It is not expected that any delay or prejudice will result to any party in this proceeding from this substitution of counsel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 10, 2015
New York, New York

By: /s/ Helen Davis Chaitman
Helen Davis Chaitman